February 16, 1988

Frances Hong, City Clerk City of Stockton 425 North El Dorado Stockton, CA 95202

Re: Combined Campaign Report
Our File No. A-88-072

Dear Ms. Hong:

This is to confirm the advice provided to Nora Keating of your office on February 10, 1988, regarding the campaign disclosure provisions of the Political Reform Act (the "Act"). 1/ This letter constitutes written advice under Section 84205.

Section 84205 states:

The Commission may by regulation or written advice permit candidates and committees to file campaign statements combining statements and reports required to be filed by this title.

Ms. Keating stated that City Councilmember John B. Nisby will be the subject of a recall election to be held on March 22, 1988. Mr. Nisby also plans to run in the city's June 7, 1988, primary election. To comply with the Act's campaign disclosure requirements, Mr. Nisby would have to file five disclosure reports during the first six months of 1988, one of which will cover only a 12-day period (March 6--the day after the closing date of the second pre-election statement in connection with the March 22 election--through March 17--the closing date of the first pre-election statement in connection with the June 7 election). Therefore, we believe it is appropriate to permit Mr. Nisby to combine two of the required statements.

½/Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise noted. Commission regulations appear at 2 California Code of Regulations Section 81000, et seq. All references to regulations are to Title 2, Division 6 of the California Code of Regulations.

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Ms. Keating was advised that Mr. Nisby should file campaign disclosure reports on the following schedule:

Type of Statement	Period Covered	Filing Deadline
lst Pre-Election for March election	Jan. 1 - Feb. 6	February 11
2nd Pre-Election for March combined with 1st Pre-Election for June election	Feb. 7 - Mar. 5	March 10
2nd Pre-Election for June election	Mar. 6 - May 21	May 26
Semi-Annual	May 22 - June 30	July 31

If you have any questions regarding the above, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Diane M. Griffiths General Counsel

Carla Wardlow

By: Carla Wardlow

Political Reform Consultant